



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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May 24, 2004

Commander, Southern Division  
Naval Facilities Engineering Command  
Attn: Mr. Anthony Robinson  
2155 Eagle Drive  
North Charleston, South Carolina 29406

Re: Responses to Comments regarding the  
Draft Remedial Investigation and Risk  
Assessment Report Site 22 – Building 105  
Center Great Lakes, Great Lakes, Illinois

0971255048 – Lake  
Naval Station Great Lakes  
Superfund/Technical

Dear Mr. Robinson:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's Responses to Illinois EPA's Comments on the Draft Remedial Investigation and Risk Assessment Report, Site 22 – Building 105, Old Dry Cleaning Facility from Tetra Tech NUS, Inc. They were received electronically at Illinois EPA on May 12, 2004. The Agency has reviewed the Navy's responses and has the following follow-up comments:

- 1) **Response to comment number 32** – The Agency's original comment requested that the contaminant concentration in trench air be designated consistently such as " $C_{\text{trench}}$ ". Revisions have not been made in the equation for intake of trench air, i.e.,  $\text{Intake}_{\text{trench}}$  rather than  $\text{Intake}_{\text{ai}}$  and  $C_{\text{trench}}$  rather than  $C_{\text{ai}}$ . Please make the requested corrections.
- 2) **Response to comment number 33** – This comment was only partially addressed. Section 6.3 of the draft report discusses the toxicity values utilized in the human health risk assessment section. The primary source for these values is stated as being the Integrated Risk Information System (IRIS). IRIS does not provide noncancer inhalation reference doses (RfD) or cancer inhalation slope factors (CSF). For the inhalation route, IRIS provides reference concentrations (RfC) and unit risks (UR). Statements in Section 6.3 such as, "The toxicity value used to evaluate noncarcinogenic health effects was the Reference Dose (RfD). Carcinogenic effects were quantified using the Cancer Slope Factor (CSF)." and "Oral and inhalation RfDs and CSFs used in the risk assessment for Site 22 were obtained from the following primary sources: (IRIS and NCEA)" are

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technically incorrect. The section should clarify that the inhalation values were derived from IRIS and NCEA RfCs and URs.

- 3) **Response to comment number 45** – The Agency has inquired of USEPA regarding the substance of this comment. There appears to be a discrepancy between the full and summary IRIS records for vinyl chloride. The full vinyl chloride IRIS record at section II.B.1.3 states that a cancer slope of 1.4 per mg/kg-day should be used to evaluate risk for a lifetime exposure including birth. The subject human health risk assessment uses 1.5 per mg/kg-day. However, the Illinois EPA recognizes that the differences between risks calculated using slopes of 1.4 per mg/kg-day and 1.5 per mg/kg-day are small and, due to the ambiguity of the IRIS entries, we will not ask that these calculations be revised.
- 4) **General:** Responses to a number of comments appear to be adequate, however, we were unable to confirm the responses due to the absence of revised pages. Those responses included pages or tables relating to comment numbers 37, 43, 44, 47, 48, 50-55, and 57 a-h. Final confirmation that the specified changes have been made cannot occur until the revised pages have been reviewed. Therefore, Illinois EPA requests the Navy provide these revised pages for Agency review.

If you have any questions or require additional information, please contact me at (217) 557-8155 or by electronic mail at [brian.conrath@epa.state.il.us](mailto:brian.conrath@epa.state.il.us).

Sincerely,

*Brian A. Conrath*

Brian A. Conrath  
Remedial Project Manager  
Federal Facilities Unit  
Federal Site Remediation Section  
Bureau of Land

BAC: *BAC*  
BAC: \\rac:h\GIntc\Site 22 related\site22RI\RtCrww

cc: Owen Thompson, USEPA (SR-6J)  
Bob Davis, Tetra Tech NUS, Inc.  
Mark Shultz, US Navy - EFA Midwest